

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Criminal No. 21-cr-20184

Plaintiff,

Honorable Shalina D. Kumar

v.

Violation:
21 U.S.C. §§ 841(a)(1)

D-1 Michael Fraley, Jr.,
a/k/a “Sarge,”

Defendant.

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INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

(21 U.S.C. §§ 841(a)(1) & (b)(1)(B)(viii) – Possession with Intent to Distribute
Five or More Grams of Methamphetamine)

D-1 Michael Fraley, Jr.

1. On or about March 24, 2020, in the Eastern District of Michigan, defendant, Michael Fraley, Jr., a/k/a Sarge, knowingly possessed with the intent to distribute five or more grams of actual methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

All in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii).

FORFEITURE ALLEGATION

2. Pursuant to Fed. R. Cr. P. 32.2(a), the government hereby provides notice to the defendant of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or property traceable thereto, of the violations set for in this Information.

3. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

DAWN N. ISON
United States Attorney

ANTHONY VANCE
Chief, Branch Offices

s/BLAINE LONGSWORTH
BLAINE LONGSWORTH
Assistant United States Attorney

Dated: 09-20-2022

Companion Case information MUST be completed by AUSA and initialed

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 21-cr-20184
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: BL

Case Title: USA v. Michael Fraley, Jr.County where offense occurred: Genesee CountyCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty

 Indictment/ Information --- no prior complaint.
 Indictment/ Information --- based upon prior complaint [Case number:]
 Indictment/ X Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case InformationSuperseding to Case No: 21-cr-20184 Judge: Shalina D. Kumar

- ☐ Corrects errors; no additional charges or defendants.
☒ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

Date: September 20, 2022

s/BLAINE LONGSWORTH
 Blaine Longworth
 Assistant United States Attorney
 600 Church Street, Flint, MI 48502
 Phone: 810-766-5177
 E-Mail address: bblaine.longsworth@usdoj.gov
 Attorney Bar #: P55984

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.